

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Digital Audio Broadcasting Systems)	
And Their Impact On the Terrestrial Radio)	MM Docket No. 99-325
Broadcast Service.)	

COMMENTS OF ALPS ELECTRIC (USA), INC.

ALPS Electric (USA), Inc. hereby submits its comments in response to the Federal Communications Commission’s recent public notice concerning terrestrial digital audio broadcasting (“DAB”). *Comments Sought on National Radio Systems Committee DAB Subcommittee’s ‘Evaluation of the iBiquity Digital Corporation IBOC System’*, MM Docket No. 99-325, DA 01-2932 (Dec. 19, 2001) (“Public Notice”). The FCC’s Public Notice seeks comment from interested parties on recent developments concerning In-Band On-Channel (“IBOC”) DAB. In particular, the FCC has asked for comment on a report from the National Radio Systems Committee (“NRSC”) endorsing iBiquity Digital Corporation’s (“iBiquity”) IBOC system. The Public Notice also seeks comment on iBiquity’s recent report on testing of its FM IBOC system. Based on these recent advancements in the development of IBOC, ALPS Electric (USA), Inc. encourages the FCC to endorse the iBiquity IBOC system to permit the commencement of digital broadcasting.

ALPS Electric (USA), Inc., headquartered in San Jose, CA, together with ALPS Electric Co., Ltd. of Japan, and ALPS Automotive, Inc., headquartered in Auburn Hills, MI, (collectively hereinafter called ALPS), is in the business of manufacturing electronic

parts, components, sub assemblies and tuner modules, which are sold to all the major brands. ALPS has executed a Technology, Marketing and Development Agreement with Ibiquity which will enable Alps' products to be used with Ibiquity's IBOC technology to make IBOC capable receivers; ALPS is also working with Ibiquity to identify and address potential business opportunities; and ALPS is working with Ibiquity to ensure the IBOC System will perform at an optimal level on OEM and aftermarket receivers.

ALPS encourages the FCC to move forward with an endorsement of the iBiquity system. As a leading manufacturer of audio products, ALPS has closely followed the development of IBOC technology and the iBiquity system. ALPS believes iBiquity's system has reached the stage for successful commercialization. However, successful introduction of IBOC is dependent on the proper regulatory environment from the FCC. In this regard, ALPS submits these suggestions to the FCC as it considers the implementation of IBOC.

ALPS is putting in place its plans for commercial introduction of IBOC receiver components. As with any new product introduction, that process will require a significant commitment of time and capital to ensure a successful launch. Outstanding regulatory uncertainty about the U.S. government's commitment to IBOC, however, will delay any company's commitment to such expenditures. ALPS would like to see the FCC adopt a definitive IBOC standard and provide a comprehensive set of transition rules to provide consumers with all the information they need to move forward with IBOC. But ALPS also believes the FCC can act now to foster the IBOC commercialization while the FCC finalizes an IBOC standard and comprehensive IBOC rules.

ALPS encourages the FCC to endorse immediately IBOC as the most promising means of implementing DAB in the United States. The FCC should end speculation that the FCC will pursue an out-of-band solution for the U.S. market. In addition, the FCC should provide an unqualified endorsement of the iBiquity system as the IBOC system to be implemented in the United States. Those steps can be taken before the FCC finalizes its IBOC rules but will provide component manufacturers, such as ALPS with confidence that an immediate investment in IBOC will not be impacted by the pursuit of a different regulatory solution for DAB.

Immediate action by the FCC is imperative if receiver manufacturers are to make investments in time to introduce IBOC receivers into the market in 2003. There are significant lead times involved in the production of IBOC equipment so regulatory delay will translate into delayed commercialization.

For the foregoing reasons, ALPS respectfully encourages the FCC to endorse iBiquity's IBOC DAB system to encourage the introduction of this new technology.

Respectfully submitted,

[Name]

[Address]

[Telephone Number]

Dated: February __, 2002